

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TSDC, LLC, et al.)	CASE NO. 1:14-cv-02699-DCN
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
v.)	
)	JOINT MOTION TO EXTEND FACT
ANN (ANTOINETTE) GALVAN, et al.)	DISCOVERY DEADLINE
)	
Defendants.)	

Pursuant to Fed.R.Civ.P. 6(b)(1)(a), Plaintiff TSDC, LLC (“Plaintiff”) and Defendants Antoinette and Gloria Galvan (“Defendants” and together with Plaintiff, the “Parties”) respectfully request that the deadline to conduct discovery be extended for 30 days. The current discovery deadline is scheduled for September 30, 2016. (E.C.F. # 45.) Thus, the Parties seek an extension, through and including October 31, 2016, in which to complete discovery in this matter.

On May 9, 2016, this case was referred to Magistrate Judge Baughman for settlement discussions. (E.C.F. # 46.) Despite several settlement conferences and extensive settlement negotiations for a period of over three months, the Parties were unable to resolve the dispute and must now re-commence discovery. To that end, the Parties have been coordinating with respect to the scheduling of depositions and other discovery matters. But given the number of potential witnesses and the physical locations of those witnesses, which includes Long Beach, California, Ames, Iowa, and Cleveland, Ohio, among other possible locations, additional time is needed to coordinate schedules and travel arrangements.

This motion is not filed for purposes of delay but to further the interests of justice by ensuring that the Parties are afforded the opportunity to engage in discovery that is central to this litigation. An extension of the discovery deadlines will not cause any undue prejudice or delay, as evidenced by the fact that the Parties stipulate to the extension being sought in this Motion. Furthermore, while a status conference is currently set for September 26, 2016 (E.C.F. # 45), there is currently no date set for dispositive motions, pre-trial conference, or trial. Thus, an extension of the discovery deadline will not impact any other case dates because there are currently no other case dates scheduled in this matter.

Accordingly, the Parties respectfully request that the Court issue an order extending the deadline for completion of discovery through and including October 31, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2016, I caused the foregoing t to be electronically served with the Court's electronic filing system to all attorneys indicated on the electronic filing receipt.

/s/ William A. Doyle
William A. Doyle (0090987)